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**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF CALIFORNIA**

CALIFORNIA SPORTFISHING  
PROTECTION ALLIANCE,

Plaintiff,

v.

KATHLEEN ALLISON, in her official  
capacity as Secretary of the California  
Department of Corrections and Rehabilitation,

Defendant.

COUNTY OF AMADOR, a public agency of  
the State of California,

Plaintiff,

v.

KATHLEEN ALLISON in her official  
capacity as Secretary of the California  
Department of Corrections and Rehabilitation;  
PATRICK COVELLO in his official capacity  
of Warden of California Department of  
Corrections and Rehabilitation Mule Creek  
State Prison; and CALIFORNIA  
DEPARTMENT OF CORRECTIONS AND  
REHABILITATION,

Case No: 2:20-cv-2482-WBS-AC

**REQUEST FOR WAIVER OF TWENTY-  
FIVE (25) PAGE LIMIT FOR JOINT  
STATEMENT RE DISCOVERY  
DISAGREEMENT UNDER  
MAGISTRATE CLAIRE'S STANDING  
ORDER REGARDING LOCAL RULE 51**

Date: December 22, 2021 (*hearing vacated*)

Case No. 2:21-cv-0038-WBS-AC

Defendants.

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Attorneys for Plaintiff  
COUNTY OF AMADOR

**WHEREAS**, Plaintiffs have filed a motion to compel access to the Mule Creek State Prison operated by Defendants in this action (ECF Document No. 22);

**WHEREAS**, the motion seeks to address all of Defendants' objections to the First Request for Inspection of Land and Property ("Dry Inspection Request") and the Second Request for Inspection of Land and Property ("Wet Inspections Request"), most of which are common to both sets of objections;

**WHEREAS**, the efficient resolution of these issues in a single proceeding will establish the ground rules for the Facility inspections in this case, avoiding the need to come back to the Court for each successive inspection request;

**WHEREAS**, Plaintiffs have prepared the initial draft Joint Statement Re Discovery Disagreement ("Draft Joint Statement") due on December 15, 2021, serving it on Defendants on December 8, 2021;

**WHEREAS**, the recitation of the discovery requests at issue, and objections thereto, without more, is over 21 pages, rendering the full document, before Defendants' edits, roughly 37 pages in length;

1       **WHEREAS**, Plaintiffs have requested that Defendants either withdraw some of their  
2 objections or agree to jointly request that the Court grant a waiver of the 25-page limit set forth in  
3 Magistrate Claire's Standing Orders; and,

4       **WHEREAS**, at the time of this filing, Defendants have not agreed to either withdraw  
5 some of their objections or to join in this request.

6  
7       **THEREFORE**, good cause appearing, Plaintiffs hereby request that the parties be granted  
8 a waiver of the 25-page limit set forth in Magistrate Claire's Standing Orders as set forth in the  
9 [Proposed] Order below.

10  
11 Dated: December 10, 2021

LAW OFFICES OF ANDREW L. PACKARD

12 By: /s/ Andrew L. Packard

13 ANDREW L. PACKARD

14 Attorneys for Plaintiff

CALIFORNIA SPORTFISHING

15 PROTECTION ALLIANCE

16 Dated: December 10, 2021

BEST BEST & KRIEGER LLP

17 By: /s/ Rebecca Andrews (auth. obtained on 12/10/21)

18 GENE TANAKA

19 SHAWN D. HAGERTY

REBECCA ANDREWS

20 Attorneys for Plaintiff

COUNTY OF AMADOR


**[PROPOSED] ORDER**

Good cause appearing, IT IS HEREBY ORDERED that the parties are granted a waiver of the 25-page limit set forth in Magistrate Claire's Standing Orders;

IT IS FURTHER ORDERED that the Parties' Joint Statement Re Discover Disputes in the pending motion to compel site inspections shall be limited to 50 pages.

IT IS SO ORDERED.

Dated: December 10, 2021

  
ALLISON CLAIRE  
UNITED STATES MAGISTRATE JUDGE